

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

SCOTT D. MCCLURG, et al., )  
 )  
 Plaintiffs, )  
 )  
 vs. ) Pertaining to Cases Consolidated for  
 ) Discovery and Pretrial Proceedings under  
 MALLINCKRODT, INC., et al., ) Lead Case No. 4:12CV00361 AGF  
 )  
 Defendants. )  
 )  
 )

**PROPOSED ORDER REGARDING PRODUCTION OF  
ELECTRONICALLY STORED INFORMATION**

In response to the Court's May 8, 2015 Order (Doc. 295), Defendants submit their proposed Order regarding the discovery of Electronically Stored Information, attached as Exhibit A, and request that the same be entered by this Court.

The Parties have agreed to revise certain initial deadlines due to the passage of time since the competing orders were submitted to the Court. These changes are reflected in Sections B and C. The remainder of the Order is unchanged from Defendants' prior proposal (Doc. 287).

WHEREFORE, Defendants respectfully request that the Court enter the attached Order regarding the discovery of ESI.

Dated: May 13, 2015

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of May, 2015, I electronically filed the above with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to counsel of record.

/s/ Steven D. Soden

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